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**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

IN RE: JOHNSON & JOHNSON TALCUM
POWDER PRODUCTS MARKETING,
SALES PRACTICES AND PRODUCTS
LIABILITY LITIGATION

Case No. 3:16-md-2738 (MAS)/(RLS)

MLD Case No. 2738

[FILED ELECTRONICALLY]

Return Date: January 2, 2024

DECLARATION OF JAMES F. CONLAN

I, JAMES F. CONLAN, declare:

Personal Qualifications and Basis of Knowledge

1. I make this declaration based on personal knowledge and in opposition to Defendants Johnson & Johnson and LTL Management, LLC (collectively, J&J's) Order to Show Cause Seeking to Disqualify Andy D. Birchfield, Esq. and Beasley Allen Crow Methvin Portis & Miles, P.C. (Beasley Allen) from this litigation and remove Beasley Allen from the Plaintiffs' Steering Committee.
2. I received my juris doctor in 1988 from the University of Iowa College of Law.
3. Since my graduation from law school in 1988, I have had several law firm jobs. I

served as Global Practice Leader of Sidley Austin's world-wide Restructuring Practice where I practiced for 32 years. Most recently I served as a Partner and Global Co-Head of Restructuring at Faegre Drinker Biddle & Reath, LLP until 2022.

4. During my tenure as Partner and Global Co-Head of Restructuring at Faegre Drinker Biddle & Reath, LLP, I represented J&J.

5. In March of 2022, I co-founded Legacy Liability Solutions LLC (Legacy). I currently serve as the Chief Executive Officer of Legacy.

6. In March of 2022, I became a non-practicing lawyer. I am active and authorized to practice law, but I do not practice law and have no clients.

7. At no point in time have I ever been a member, partner, employee or counsel at Beasley Allen, Mr. Birchfield's law firm.

J&J's Baseless Allegations and My Thirty-Five (35) Years of Ethical Conduct and Compliance with the Attorney Rules of Professional Conduct

8. I am well aware of the Rules of Professional Conduct, including RPC 1.6 Confidentiality of Information. This Rule states from the outset: "A lawyer shall not reveal information relating to representation of a client" The attorney-client privilege is the bedrock of client communications and I have understood this—and acted accordingly—since I took and passed the bar exam. Similarly, I have at all relevant times been aware of and complied with RPC 1.9(a) and 1.9(c), which govern an attorney's professional and ethical obligations to former clients.

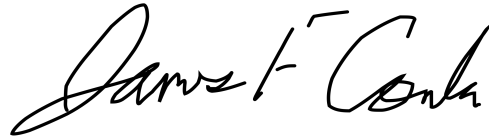
9. Consistent with the Rules of Professional Conduct, I have never disclosed to Mr. Birchfield or any member of his firm, Beasley Allen, any confidential information belonging to J&J—nor that of any other client from my previous years of practice.

10. Moreover, neither Legacy nor I have any J&J privileged or confidential information that is required for Legacy to consensually transact with J&J to solve J&J's current and future talc

liability (with finality); the Legacy model applies similarly to all solvent mass tort defendants.

Under 28 U.S.C. 1746, I hereby declare under penalty of perjury that the foregoing is true and correct.

Executed on December 17, 2023

A handwritten signature in black ink, appearing to read "James F. Conlan", written in a cursive style.

JAMES F. CONLAN
Chief Executive Officer
Legacy Liability Solutions LLC